

From: [REDACTED]
To: HornseaProjectThree@pins.gsi.gov.uk
Subject: Hornsea Project Three - Registration Number 20010316 Oulton Parish Council/written submission of oral representation
Date: 29 March 2019 14:37:48
Attachments: [ORSTED-OPC-Appendix 1 to Deadline 10.docx](#)

**Re: Registration Number 20010316
Hornsea Project Three
Open Floor Hearing Monday 25th March**

Written submission of Oral representation from Susan Mather on behalf of Oulton Parish Council, including supporting information (Appendix 1 attachment)

In the last few weeks Oulton Parish Council has read documents relating to cumulative impact, which were submitted by Orsted and Vattenfall. In these documents both projects had sought to justify that on roads where there would be cumulative traffic, it would not be detrimental to residents in terms of route sensitivity, noise and vibration and that those roads could cope with the impact of greater volumes of traffic, especially HGVs.

OPC were shocked to find on reading the cumulative traffic reports, that although the same methodology and traffic data has apparently been used for each report (baseline traffic data 2022), the outcomes appear to be very different; there were differing percentage increases in all traffic numbers and especially for HGVs.

In Orsted's Cumulative Impact Assessment for Oulton there was a 548% increase in HGV's, according to Appendix 28 and a 594% increase for the same Link in an earlier Appendix 25 - so there is some confusion as to what the actual increase is. Vattenfall's CIA for Oulton was a 487.2% increase, so huge variations using the same data. It should be noted that all outcomes would fall within the IEMA guidelines showing that a greater than 30% increase in traffic needed further assessment. (****see Appendix 1 for supporting information.**)

Incidentally LINK 208 appears not to have been assessed for air quality, which is surprising considering the increase in HGVs using that route and given the close proximity to the road of one property. (****see Appendix 1 for supporting information.**)

Rather surprisingly then, given the percentage increase for LINK 208 'The Street,' was the noise assessments carried out by Orsted at one property, where the outcome was; 'moderate adverse' but with proposed road intervention mitigations, re-grading the road, reducing the speed limit to 30mph, the results were reduced to 'minor'. I think residents find it hard to understand how, with an obvious increase in traffic numbers generated by both of these projects, on previously quiet rural roads, the outcome for noise or route sensitivities can be 'minor' or 'negligible'. The more cynical amongst us would think that this is a result of statistical smoothing.

Oulton has recently learnt, on reading Orsted's latest outline Construction Traffic Management Plan, that although there will be NO Abnormal Load deliveries at night TO the cable corridor FROM the Main Construction Compound, they have not excluded abnormal load deliveries TO the compound at night FROM the port. This makes a complete nonsense of the core working hours. OPC therefore can only conclude that the main construction compound will be operating 24 hours a day, bringing with it the potential for night time noise and light pollution from those deliveries. This will have implications for Oulton residents and *for all of those living along the cable delivery route from the port*, wherever that might be.

Both projects have, in their CIA documents, produced a map of roads in Norfolk that would be impacted by cumulative traffic. This map is a stark reminder to Norfolk residents and businesses just how this traffic might impact their lives for several years. Many of the major routes in North Norfolk will experience delays and increased traffic. This includes the tourist routes on A148/A140 between the cable route landfall areas of Happisburgh and Weybourne, and will also impact Cromer. Further inland at the cable corridor crossover point, the impact will mean possible diversions, as roads are closed at sections while trenching and ducting is carried out, especially as Vattenfall does not intend to use trenchless crossing at some roads.

While the two projects will no doubt arrange how they can manage to work in the same areas, for local businesses, especially for Norfolk farms, there would be the need for careful planning, especially for those crops where time related harvesting is crucial. For example, the pea harvest needs to be picked and arrive at processing plants in hours....not held up by an AIL (Abnormal Indivisible Load) along its route! The issue of agricultural traffic on the same roads and the increase in HGVs from these projects has been underestimated.

In this final phase of this examination process many residents must feel that their lives really do not matter, when assessments and mitigations seemingly can be steered in favour of a beneficial outcome to the developer.

Susan Mather, Oulton Parish Council.

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Hornsea Project Three

OULTON PARISH COUNCIL: written submission of oral presentation at Deadline 10

Appendix 1

Supporting information

Air Quality assessment.

There has been one air quality assessment carried out for the project (**Air Quality Environmental Statement May 2018**) and that did not include **LINK 208 'The Street' or the Old Railway Gatehouse**. The map only covered an area 350m around the Main Construction Compound itself and excluded the access route (The Street, Oulton) and the Old Railway Gatehouse. The air quality assessment also did not take into consideration the cumulative impact of Hornsea Three and Vattenfall or their combined daily HGV movements, in this location.

The Old Railway Gatehouse has been assessed for noise and vibration due to road traffic increases, especially HGVs. As a result of the noise and vibration assessment, a road intervention scheme has been proposed as mitigation to reduce potential noise impacts. It should also have been necessary to assess air quality at this property given the close proximity to the road and the increase in proposed HGVs.

OPC would maintain that it is unacceptable for the Applicant to consider that, because of the road intervention scheme introduced to mitigate *noise and vibration effects* at the Gatehouse, this should somehow obviate the need for an *air quality assessment* at the same time. *The two issues are **entirely separate**, and the level of emissions caused by the increase in all traffic will need to be evaluated and mitigated separately.*

The paragraph below, taken from **Chapter 9 – Air Quality Environmental Statement May 2018 (page 23)**, suggests that air quality assessments should have been carried out, as the daily HGV movements would be above 100 movements a day. Hornsea Three and Vattenfall would generate 214 extra HGV movements daily on 'The Street' at the Old Railway Gatehouse.

9.9.1.2 Environmental Protection UK (EPUK) guidance on the assessment of air quality effects (EPUK and IAQM, 2017) indicates that air quality assessment of construction traffic is likely to be necessary for those large, long-term construction sites that would generate large HGV flows (of over 100 movements per day) over a period of a year or more. Details of the traffic likely to be generated by the onshore elements of Hornsea Three have been set out in chapter 7: Traffic and Transport. Traffic generated during the construction and decommissioning phases of Hornsea Three are predicted to exceed the EPUK indicative thresholds for triggering an assessment of air quality impacts from construction traffic (HGV flows of over 100 movements per day over a period of a year or more) and as such, an assessment of traffic emissions has been undertaken.

Cumulative impact assessments: Orsted & Vattenfall HGV percentage increase.

Hornsea Three cumulative impact Appendix 28 LINK 208

EN010080-001856-Ørsted Hornsea Project Three (UK) Ltd - Appendix 28 - Cumulative Link Impact A... 7 / 18

Table 2.1: Summary of Daily Two Way Traffic Movements at Oulton and Cawston

Hornsea Three Link	2022 Base		HOW03 Construction		Norfolk Vanguard		HOW03+NV Percentage Increase	
	Total	HGVs	Total	HGVs	Total	HGVs	Total	HGVs
Link ID 89: B1145 in Cawston	3,477	127	370	127	322	168	19.9%	232%
Link ID 208: The Street between A1149 and Oulton airfield access	788	369	248	118	176	96	53.8%	548%

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Hornsea Three Cumulative impact Appendix 25 LINK 208 (LINK 68 last entry on the Table)

****Please note:** Hornsea Project Three, in the documents below, has consistently *mis-numbered* the B1149 (Holt Road) as the A1149.

EN010080-001751-Ørsted Hornsea Project Three (UK) Ltd - Deadline 25 - Hornsea Three and Norf... 10 / 102

8	Link ID 141: A146 from A47 SE	15,801	2,026	114	20	340	312			2.9%	16%
11	Link ID 197: A1065, North of Swaffham	8336	530	218	124	69	0			3.4%	23%
12	Link ID 195: A1065, east of Weasenham	5,580	485	218	124	38	0			4.6%	26%
13a	Link ID 198: A148 between A1067 and A1065 junction	10,832	1,446	456	242	474	671			8.6%	63%
13b	Link ID 34: A148 west of Holt and east of Letheringsett	11,466	691	295	156	569	520			7.5%	98%
14	Link ID 36: A148, east of the B1149 rbt and west of Station Rd	12,242	612	205	122	491	420	2,822		28.7%	88%
18	Link ID 81: A1067 north of Bridge Rd and east of Little Ryburgh	9,451	543	157	85	401	335			5.9%	77%
19	Link ID 31: A148 from edge of study area to B1354	12,887	1,105	102	40	756	721			6.7%	69%
24	Link ID 109: A1067 from Bawdeswell to Great Witchingham	9,399	1,086	158	86	579	431			7.8%	48%
29	Link 110: A1067 through Great Witchingham and Attlebridge	13,065	884	270	92	450	335			45.5%	48%
30	Link ID 111: A1067 between Attlebridge & Fir Covert Rd junction	8,995	626	379	104	447	335			9.2%	70%
32	Link ID 59: B1149 at Edgefield N of village hall & S of Hempstead Rd	4,537	173	291	153	275	235			12.5%	224%
33	Link ID 76: B1149 from Saxthorpe rbt to Heydon Rd junction	5,787	178	394	162	390	235			13.5%	223%
34	Link ID 89: B1145 in Cawston	3,477	127	370	127	394	240			22.0%	289%
36	Link ID 114: B1149 between NDR and Buxton Rd junctions	11,400	594	635	187	347	235			8.6%	71%
37	Link ID 78: B1145 east of the B1149, west of Cawston Park Hospital	4,834	163	82	0	180	96			5.4%	59%
39	Link ID 118: A140 between A1270 and B1145	14,967	484	431	149	364	134			5.3%	58%
40b	Link ID 49: A140 south of Roughton & north of Topshill Rd junction	12,041	593	471	149	374	192			7.0%	57%
41	Link ID 190: B1436, east of Felbrigg	9,665	488	471	149	542	478			10.5%	129%
58	Link ID 204: A1270 NDR between A140 and A47 junctions	22,933	1,461	655	190	536	503			5.2%	47%
59	Link 202: A1270 between A140 and B1150	25,656	1,087	655	190	521	503			4.6%	64%
60	Link ID 201: A1270 NDR between B1149 and A140 junctions	25,000	1,593	678	187	402	335			4.3%	33%
68*	Link ID 208: The Street between A1149 and Oulton airfield access	727	36	248	118	176	96			58.3%	594%

t between A1149 and Oulton airfield access, whilst a low receptor represents the Hornsea Three main construction compound as well as a cable logistics area for Norfolk Vanguard. This link has been identified as a link which requires a specific scheme intervention in order to mitigate cumulative effects (as set out in the Outline CTMP, Appendix 3 of Deadline 6). The measures set out within Section 5 of the Outline CTMP is considered to reduce the potential impacts to a level which is not significant.

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Note ; * Link ID 208: The Street between A1149 and Oulton airfield access, whilst a low receptor represents the Hornsea Three main construction compound as well as a cable logistics area for Norfolk Vanguard. This link has been identified as a link which requires a specific scheme intervention in order to mitigate cumulative effects (as set out in the Outline CTMP, Appendix 3 of Deadline 6). The measures set out within Section 5 of the Outline CTMP is considered to reduce the potential impacts to a level which is not significant.



Vattenfall LINK 68 cumulative impact

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-002713-ExA;%20ISH1;%2010.D5.3%20Cumulative%20Traffic%20CIA.pdf>

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https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-002713-ExA;%20ISH1;%2010.D5.3%20Cumulative%20Traffic%20CIA.pdf

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Link	Description	2022 Norfolk Vanguard Percentage Increase		2022 Hornsea Project 3 Percentage Increase		2022 Total Cumulative Percentage Increase	
		All vehicles	HGVs	All vehicles	HGVs	All vehicles	HGVs
29	A1067	3.4%	37.9%	2.1%	10.4%	5.5%	48.4%
30	A1067	3.9%	46.4%	3.3%	14.4%	7.2%	60.7%
32	B1149 - Edgefield	6.2%	285.2%	6.6%	185.9%	12.8%	471.2%
33	B1149 - Holly road	6.7%	132.1%	6.8%	91.1%	13.6%	223.2%
34	B1145 - west of Cawston	13.5%	839.6%	12.7%	445.2%	26.3%	1284.8%
36	B1149 - Horsford	4.2%	147.5%	7.7%	117.5%	11.8%	265.1%
37	B1145 - Cawston road	4.3%	178.2%	2.0%	0.0%	6.3%	178.2%
39	A140 - Hevingham	2.4%	26.9%	2.9%	29.9%	5.3%	56.8%
40b	A140 - Roughton	2.8%	32.2%	3.6%	25.1%	6.4%	57.3%
41	B1436 - Felbrigg	7.7%	302.7%	6.7%	94.3%	14.5%	397.0%
58	NDR - Link a	1.4%	32.0%	1.8%	12.1%	3.2%	44.1%
59	NDR - Link b	2.0%	46.3%	2.6%	17.5%	4.66%	63.7%
60	NDR - Link c	2.1%	41.3%	3.5%	23.1%	5.6%	64.4%
68	The Street / Heydon Road	16.0%	218.3%	22.6%	268.9%	38.6%	487.2%
%	Exceeded GEART screening thresholds for Norfolk Vanguard alone as identified in ES Chapter 24						
%	Exceeds GEART screening thresholds for Cumulative Impact Assessment.						

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